

REMARKS

Claims 1-18 are pending in the application. While no claims are amended hereby, Applicant has provided a listing of the claims for the convenience of the Examiner. Claims 1, 4-6, 10, and 13-15 have been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 7,096,266 to Lewin et al. (“Lewin”). Claims 2-3, 9, 11-12, and 18 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Lewin in view of U.S. Patent No. 6,996,616 to Leighton et al. (“Leighton”). Claims 7-8, and 16-17 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Lewin in view of U.S. Patent No. 7,054,304 to Wang (“Wang”). Claims 1, 9-10, and 18 are independent.

Claims 1, 4-6, 10, and 13-15 are rejected under 35 U.S.C. § 102(e) as anticipated by Lewin. Claims 1 and 10 are independent. Claims 2-3, 9, 11-12, and 18 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Lewin in view of Leighton. Claims 9 and 18 are independent. Independent claims 1, 9-10, and 18 each recite: “a shared cache server being placed on a common network... a plurality of groups, comprising: a storage device to store contents in each of a plurality of storage areas allocated corresponding to said plurality of groups.” Independent claims 1 and 10 also recite “a shared cache server being placed on a common network in which a plurality of virtual networks each being placed in a virtually partitioned manner is constructed corresponding to a plurality of groups.” Nothing in Lewin, either alone or in combination with Leighton, discloses these limitations.

First, independent claims 1 and 10 recite “a plurality of virtual networks each being placed in a virtually partitioned manner is constructed corresponding to a plurality of groups.” The Office Action cites to Fig. 3 and column 6, lines 36-46 for this limitation.

However, quite to the contrary, column 6 describes a central office and one or more remote offices, where a remote office is connect to the central office over a private line over a virtual private network. Indeed, the Office Action admits that column 6, lines 36-46 show “*i.e.*, one or more remote offices that connects to the central office over a **VPN**” (emphasis added). Lewin only teaches the incorporation of a single VPN in his network. Thus, Lewin does not teach or suggest the claimed “plurality of virtual networks,” much less “a shared cache server being placed on a common network in which a plurality of virtual networks each being placed in a virtually partitioned manner is constructed corresponding to a plurality of groups.”

As regards all independent claims 1, 9-10 and 18, the Office Action alleges that the content server described in Fig. 2 and at column 5, lines 45-58 of Lewin discloses a shared cache server. The Office Action also states that Fig. 1, reference 102 and column 4, lines 39-67 disclose the claimed “storage device to store contents in each of a plurality of storage areas allocated corresponding to said plurality of said groups,” referencing the CDN server. However, nothing in Lewin, including the cited figures and descriptions in Lewin’s specification, teach or suggest a shared cache server that comprises a storage device to store contents in each of a plurality of storage areas allocated corresponding to said plurality of groups. To the contrary, Lewin’s content edge server shown at Fig. 2 does not show how any of its storage is allocated, much less “a plurality of storage areas allocated corresponding to said plurality of groups,” as claimed in each of the independent claims.

Applicant also notes that Fig. 3A (discussed above) shows multiple CDN servers - not a single server. Similarly, Fig. 1, rather than showing a single CDN server, instead

shows multiple CDN servers. There is no disclosure that any single server of the CDN content edge servers shown at Fig. 1 (or Fig. 3) or described in Fig. 2 can operate “as a shared cache server” much less a shared cache server that includes “a storage device to store contents in each of a plurality of storage areas allocated to said plurality of groups.”

For the reasons laid out above, Applicant urges that Lewin does not disclose the above-recited limitations found in independent claims 1, 9-10, and 18. With respect to claims 9 and 18, nothing in Leighton cures the deficiency of the Lewin reference as against these limitations. Accordingly, Applicant urges that each of the independent claims are presently in condition for allowance and urges reconsideration and withdrawal of the rejection thereto.

As all of the remaining claims depend from independent claims 1, 9, 10, and 18, and as nothing in Leighton or Wang cure the deficiency of the Lewin reference as applied to the independent claims, Applicant urges that all the claims are in condition for allowance and urges reconsideration and withdrawal of the rejections thereto.

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

No fee is believed to be due for this Amendment. Should any fees be required, please charge such fees to Deposit Account No. 50-2215.

Dated: May 23, 2007

Respectfully submitted,

By /Brian M. McGuire/
Brian M. McGuire

Registration No.: 55,445
DICKSTEIN SHAPIRO LLP
1177 Avenue of the Americas
41st Floor
New York, New York 10036-2714
(212) 277-6500
Attorney for Applicant